

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

V

ALONZO FLOWERS,
JERRIEUS WILLIAMS,
aka JERRIUS WILLIAMS
ANDRA COLEMAN,
aka ANDRE COLEMAN,
KYE RUE, and
PAUL MCCOY, JR.,
Defendants

CRIMINAL NO.: H-15-

United States Court
Southern District of Texas
FILED

MAY 20 2015

David J. Bradley, Clerk of Court

INDICTMENT

THE GRAND JURY CHARGES THAT

COUNT ONE

Title 18, United States Code, § 1951(a)-
Conspiracy to Interfere with Commerce by Robbery

INTRODUCTION

At all times material to this Indictment, Jet Pawn, 6135 F.M. 2920, Spring, Texas, was a Federal Firearms Licensee and was engaged in the business of the sale of consumer goods and firearms, which travel in interstate commerce and which affect interstate commerce.

At all times material to this Indictment, Cash America Pawn, 3211-B F.M. 1960, Humble, Texas was engaged in the business of the sale of electronics and consumer goods, which travel in interstate commerce and which affect interstate commerce.

At all times material to this Indictment, Mad Dog Smoke Shop, 966 West F.M. 1960, Houston, Texas was engaged in the business of the sale of consumer goods, which travel in interstate commerce and which affect interstate commerce.

Beginning on or about January 8, 2015 and continuing until on or about January 29, 2015, in the Houston Division of the Southern District of Texas,

ALONZO FLOWERS,
JERRIEUS WILLIAMS,
aka JERRIUS WILLIAMS,
ANDRA COLEMAN,
aka ANDRE COLEMAN,
KYE RUE, and
PAUL MCCOY, JR.,

defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with each other, and others known and unknown to the Grand Jury, to obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendants did unlawfully combine, conspire, confederate, and agree with each other, to unlawfully take and obtain property, namely, firearms, jewelry, and United States currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items; in violation of Title 18, United States Code, § 1951(a).

MANNER AND MEANS

The unlawful conspiracy was accomplished in the following manner and means:

1. It was part of the conspiracy that co-conspirators would conduct surveillance of the premises in preparation to commit the robberies indicted below.

2. It was further part of the conspiracy that one or more co-conspirators would act as a lookout during the commission of the robbery.
3. It was further part of the conspiracy that co-conspirators would enter the store, display a firearm, and take by threat of force firearms, jewelry and/or cash.
4. It was further part of the conspiracy that co-conspirators would divide the proceeds from the robberies.

OVERT ACTS

In furtherance of this conspiracy, and in order to effect and accomplish its objectives, one or more of the defendants committed in the Southern District of Texas the overt acts alleged in Counts Two through Seven of this Indictment which are re-alleged and incorporated herein by reference.

COUNT TWO

Title 18, United States Code, §§ 1951(a) and 2 – Aiding and Abetting Interference with Commerce by Robbery

On or about January 9, 2015, in the Houston Division of the Southern District of Texas,

JERRIEUS WILLIAMS,
aka JERRIUS WILLIAMS,
ANDRA COLEMAN,
aka ANDRE COLEMAN,
KYE RUE, and
PAUL MCCOY, JR.,

defendants herein, aiding and abetting each other as well as others known and unknown to the Grand Jury, did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3),

in that the defendants did unlawfully take and obtain the property of Cash America Pawn, which was in the possession and custody of an employee of Cash America Pawn, namely, United States currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT THREE

Title 18, United States Code, §§ 924(c)(1)(A) and 2: -
Aiding and Abetting Using and carrying a firearm during and in relation to a crime of violence

On or about January 9, 2015, in the Houston Division of the Southern District of Texas,

JERRIEUS WILLIAMS,
aka JERRIUS WILLIAMS,
ANDRA COLEMAN,
aka ANDRE COLEMAN,
KYE RUE, and
PAUL MCCOY, JR.,

defendants herein, aiding and abetting each other, did knowingly carry, and brandish a firearm, namely, a handgun, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that being Aiding and Abetting Interference with Commerce by Robbery.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2.

COUNT FOUR

Title 18, United States Code, §§ 1951(a) and 2 – Aiding and Abetting Interference with Commerce by Robbery

On or about January 14, 2015, in the Houston Division of the Southern District of Texas,

ALONZO FLOWERS,
JERRIEUS WILLIAMS,
aka JERRIUS WILLIAMS,
ANDRA COLEMAN,
aka ANDRE COLEMAN,
KYE RUE, and
PAUL MCCOY, JR.,

defendants herein, aiding and abetting each other as well as others known and unknown to the Grand Jury, did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendants did unlawfully take and obtain the property of Jet Pawn, which was in the possession and custody of an employee of Jet Pawn, namely, jewelry, firearms, and United States currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT FIVE

Title 18, United States Code, §§ 924(c)(1)(A) and 2: -
Aiding and Abetting Using and carrying a firearm during and in relation to a crime of violence

On or about January 14, 2015, in the Houston Division of the Southern District of Texas,

ALONZO FLOWERS,
JERRIEUS WILLIAMS,
aka JERRIUS WILLIAMS,
ANDRA COLEMAN,
aka ANDRE COLEMAN,
KYE RUE, and
PAUL MCCOY, JR.,

defendants herein, aiding and abetting each other, did knowingly carry, and brandish a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Aiding and Abetting Interference with Commerce by Robbery.

In violation of Title 18, United States Code, § 924(c)(1)(C) and § 2.

COUNT SIX

Title 18, United States Code, §§ 1951(a) and 2 – Aiding and Abetting Attempted Interference with Commerce by Robbery

On or about January 29, 2015, in the Houston Division of the Southern District of Texas,

ALONZO FLOWERS,
JERRIEUS WILLIAMS,
aka JERRIUS WILLIAMS, and
KYE RUE,

defendants herein, aiding and abetting each other as well as others known and unknown to the Grand Jury, did knowingly and intentionally attempt to obstruct, delay, and affect interstate

commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendants did unlawfully attempt to take and obtain the property of Mad Dog Smoke Shop, which was in the possession and custody of an employee of Mad Dog Smoke Shop, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT SEVEN

Title 18, United States Code, §§ 924(c)(1)(A) and 2: -
Aiding and Abetting Using and carrying a firearm during and in relation to a crime of violence

On or about January 29, 2015, in the Houston Division of the Southern District of Texas,

ALONZO FLOWERS,
JERRIEUS WILLIAMS,
aka JERRIUS WILLIAMS, and
KYE RUE,

defendants herein, aiding and abetting each other, did knowingly carry, and brandish a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Aiding and Abetting Attempted Interference with Commerce by Robbery.

In violation of Title 18, United States Code, § 924(c)(1)(C) and § 2.

Notice of Criminal Forfeiture

Pursuant to Title 18, United States Code, § 924(d)(1), and Title 28, United States Code, § 2461, the United States of America gives notice to the defendants,

ALONZO FLOWERS,
JERRIEUS WILLIAMS,
aka JERRIUS WILLIAMS,
ANDRA COLEMAN,
aka ANDRE COLEMAN,
KYE RUE, and
PAUL MCCOY, JR.,

that, in the event of conviction of the offense charged in Counts Three, Five, and Seven, the United States of America shall forfeit all firearms and ammunition involved in or used in a violation of Title 18, United States Code, § 924(c)(1)(A)(ii), including, but not limited to:

1. a Glock, model 26, 9mm caliber pistol, serial number WYR724; and
2. a Glock, model 27, .40 caliber pistol, serial number WYS609.

A TRUE BILL:

Original Signature on File

FOREMAN OF THE GRAND JURY

KENNETH MAGIDSON
United States Attorney

BY:



HEATHER WINTER
Assistant United States Attorney